

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EIG ENERGY FUND XIV, L.P.,	:
EIG ENERGY FUND XIV-A, L.P.,	:
EIG ENERGY FUND XIV-B, L.P.,	:
EIG ENERGY FUND XIV (CAYMAN), L.P.,	:
EIG ENERGY FUND XV, L.P.,	:
EIG ENERGY FUND XV-A, L.P.,	:
EIG ENERGY FUND XV-B, L.P., and	Case No. 18-cv-01047-PGG
EIG ENERGY FUND XV (CAYMAN), L.P.,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
KEPPEL OFFSHORE & MARINE LTD.,	:
	:
Defendant.	:
	:

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X

**DECLARATION OF DANIEL B. GOLDMAN**

Daniel B. Goldman, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney admitted to practice before this Court. I am a partner at the law firm Kramer Levin Naftalis & Frankel LLP, counsel for Plaintiffs EIG Energy Fund XIV, L.P., EIG Energy Fund XIV-A, L.P., EIG Energy Fund XIV-B, L.P., EIG Energy Fund XIV (Cayman), L.P., EIG Energy Fund XV, L.P., EIG Energy Fund XV-A, L.P., EIG Energy Fund XV-B, L.P., and EIG Energy Fund XV (Cayman), L.P. I submit this declaration in support of Plaintiffs' Reply in Further Support of Plaintiffs' Motion for Summary Judgment.

2. Keppel Opposition Exhibit 116, bates stamped EIG\_KEP\_00210425, is an Excel spreadsheet produced by Plaintiffs. The "Last Modified" metadata field for EIG\_KEP\_00210425 is "6/30/2015 12:00 AM," indicating that the document was last modified

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3. The contents of the foregoing metadata fields were provided to Keppel with the document production, pursuant to a Document Production Agreement between the parties. The metadata fields reflect information generated automatically by the operation of a computer or other information-technology system.

4. Attached hereto as Exhibit A is a true and correct copy of a document produced by Keppel in this litigation, which is bates stamped KEPPEL00013178 and dated March 2, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 2, 2021  
New York, New York

/s/ Daniel B. Goldman  
DANIEL B. GOLDMAN